

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORKJOHN SWANN HOLDING CORP., derivatively,
on behalf of CLUBCREATE, INC.,

Plaintiff,

against

COREY SIMMONS, CURTLAND FIELDS
ANNETTE STRICKLAND and
CLUBCRÉATE, INC.

Defendants.

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: _____ DATE FILED: <u>5/30/14</u>
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13 Civ. 8619 (AT)

**STIPULATION AND REVISED
SCHEDULING ORDER**

The parties hereto, through their undersigned counsel, submit this stipulated motion, subject to the Court's approval, for a 60-day extension of the deadlines for the completion of fact and expert discovery. The reasons for this joint request include, *inter alia*, the pursuit of settlement discussions between the parties (which have proven unsuccessful) and the substantial time and attention devoted to defendants' Motions to Dismiss the Amended Complaint, which were recently fully-briefed and remain *sub judice*. No previous extensions of the fact and expert discovery deadlines have been requested. All parties have consented to this extension request.

The proposed revised deadlines would be as follows:

	Previous Deadline	New Deadline
Completion of all fact discovery	June 20, 2014	August 19, 2014
Service of requests for production	March 30, 2014	June 9, 2014
Service of interrogatories	March 30, 2014	June 9, 2014
Completion of depositions	June 20, 2014	August 19, 2014
Service of requests to admit	May 16, 2014	July 15, 2014
Completion of expert discovery	August 4, 2014	October 3, 2014

Dated: New York, New York
May 29, 2014

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Attorney for Defendant
Curtland Fields

SO ORDERED:

Dated: New York, New York
May 29, 2014

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SO ORDERED.

Dated: May 30, 2014
New York, New York



ANALISA TORRES
United States District Judge